

IN THE UNITED STATES DISTRICT COURT
FOR THE STATE OF MASSACHUSETTS

DEBORAH KELLY,

Plaintiff,

v.

PAUL DONNELLY,
MICHAEL BYERS,
SGT. KEITH JACKSON,
OFFICER JOHN DOE, in

their individual and
official capacities, and

THE TOWN OF ROCKLAND,
MASSACHUSETTS,

Defendants.

Case No: 05-10750-RWZ

Daniel S. Sharp
Counsel for Plaintiff
196 Atlantic Avenue
Marblehead, MA 01945
781-639-1862

PIERCE, DAVIS & PERRITANO
Attorney Jeffrey Sankey
Counsel for Defendants
Ten Winthrop Square
Boston, MA 02110

PLAINTIFF'S AUTOMATIC DISCLOSURES
PURSUANT TO F.R.CIV.P. 26.2

A. Individuals likely to have discoverable information relevant
to the incident in Rockland, MA on April 20, 2002.

1. The Plaintiff

2. The defendants
3. Rockland P.O. Richard Somers
4. George Stoddard
51 Wilson Street
Rockland, MA
5. Sensimetrics Corporation
48 Grove Street
Somerville, MA 02144
(copied and enhanced audio tape of arrest)
6. Ackland Sports Medicine
Hyannis, MA

B. Description by category and location of all documents that are relevant to disputed facts alleged with particularity in the pleadings.

1. Audio tape of arrest of Deborah Kelly. Possessed by counsel for plaintiff.
2. Possible video tape of scene after arrest of Deborah Kelly. If it can be found, it belongs to George Stoddard and is in his possession.
3. Tape recorded criminal proceedings at Hingham District Court in *Commonwealth vs. Deborah Kelly*, Case No. 0258-CR-730. Possessed by counsel for plaintiff.
4. Original MTCA demand letters are in the possession of the defendant-Town.
5. Before-and-after radiology pertinent to Plaintiff-Kelly's knees are in the possession of her counsel and her medical care providers. It is unclear whether counsel has them all.
6. Dozens of photographs of the general scene of the arrest are in the possession of George Stoddard.
7. Deborah Kelly's medical records are in the possession of her care providers.

C. Computation of any category of damages claims by disclosing party

The plaintiff's approximated damages are indicated as follows.

1. Medical Expenses of approximately \$1,500.

2. Medications (OTC) to date of approximately \$3,600.
3. Lost Wages of approximately \$25,000.
4. Legal expenses to be calculated
5. Emotional distress to be determined by trier of fact

D. Insurance

None.

Respectfully Submitted,

Daniel S. Sharp (BBO 565524)
Attorney for Plaintiff
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CERTIFICATE OF SERVICE

Daniel S. Sharp certifies that a true copy of the document above was served upon the attorney of record for each other party by first-class, U.S. Mail, plainly addressed and pre-paid on July 20, 2005.
